

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

HULL’S ENVIRONMENTAL SERVICES,
INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA ex rel
SECRETARY OF ARMY/U.S. ARMY
CORPS. OF ENGINEERS; et al

Defendants/Cross-Plaintiffs.

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Case No. 6:24-cv-00479-JAR

**SUGGESTION OF BANKRUPTCY AND
NOTICE OF AUTOMATIC STAY OF PROCEEDINGS**

TO THE HONORABLE JUDGE OF SAID COURT:

The below referenced counsel respectfully files this *Suggestion of Bankruptcy* on behalf of Marina Del Rey, L.L.C. (“MDR”), one of the Defendants in the above-entitled and numbered cause, and in support thereof would respectfully show the Court as follows:

1. On March 17, 2025, MDR filed a voluntary petition for relief under chapter 11 of the United States Bankruptcy Code in the Bankruptcy Court for the Northern District of Texas, Dallas Division, commencing *In re Marina Del Rey, L.L.C.*, Case No. 25-30909-11 (the “Bankruptcy Case”). A copy of the Voluntary Chapter 11 Bankruptcy Case [Docket No. 1] is attached hereto as **Exhibit A**.

2. As a result of the bankruptcy filing, the automatic stay provisions of 11 U.S.C. § 362 prohibits the commencement or continuation of any actions against MDR or its bankruptcy estate. Accordingly, these proceedings must be stayed as to MDR.

WHEREFORE, the undersigned counsel respectfully requests that this Court take notice of the bankruptcy filing by MDR.

Dated this the 18th day of March 2025.

Respectfully submitted,

DOERNER, SAUNDERS, DANIEL &
ANDERSON, L.L.P.
700 Williams Center Tower II
Two West Second Street
Tulsa, Oklahoma 74103-3522
Telephone: 918-591-5288
Facsimile: 918-925-5288

By: /s/ Michael S. Linscott

Michael S. Linscott
OBA No. 17266
Email: mlinscott@dsda.com
Emily E. Williams
OBA No. 33456

Attorneys for Defendants, Marina Del Rey,
L.L.C. and Garrett Johnson

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of March 2025, a true and correct copy of the foregoing Suggestion of Bankruptcy was served using the Court's electronic filing/notification system (ECF) to all known parties:

Mike Mordy
Carrie Pfrehm
Michael J. Omalley
Alexander J. Sisemore
Douglas Elliott
Stephen A. Melendi

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/s/Michael S. Linscott